

EXHIBIT 4

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
CASE NO. 11-1590-LTS-HBP

UNIVERSITAS EDUCATION, LLC

Plaintiff,

VS.

NOVA GROUP, INC., as trustee,
sponsor and fiduciary of the
CHARTER OAK TRUST WELFARE
BENEFIT PLAN,

Defendant.

April 17, 2013

10:00 a.m.

DEPOSITION OF DANIEL E. CARPENTER

REPORTED BY:

MARY G. VAN DINA, Certified Court Reporter,
Certified LiveNote Reporter.

1 Daniel Carpenter 4/17/13

2 BY MS. COLBATH:

3 Q. What is the significance, if any, to
4 the January 26, 2001 date that you referenced in
5 your last answer?

6 A. The company that I work for invested
7 money for Section 1031 tax-free exchanges, and I
8 lost a little over \$8 million in the great stock
9 market fall of December of 2000, and shortly
10 thereafter, in January of 2001, there were a
11 number of lawsuits that started against the
12 company and me personally and that litigation is
13 still going on today in Boston.

14 Q. Is that company you're referring to
15 Benistar Property Exchange?

16 A. It's now called Boston Property
17 Exchange, but at that time it was Benistar
18 Property Exchange, but it's now Boston Property
19 Exchange, but at the time it was Benistar
20 Property Exchange Trust Company, but the name has
21 been changed to Boston Property Exchange.

22 Q. Who were the shareholders of Caroline
23 Financial Group, Inc.?

24 A. I don't know.

25 Q. Who would know?